

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (RCC)
ECF Case

This document relates to:

Thomas E. Burnett, Sr., et al. v. Al Baraka Investment & Development Corp., et al., Case Nos. 03-CV-5738 and 03-CV-9849 (S.D.N.Y.)

Federal Insurance Co., et al. v. Al Qaida, et al., Case No. 03-CV-6978 (S.D.N.Y.)

Continental Casualty Co., et al. v. Al Qaeda Islamic Army, et al., Case No. 04-CV-05970-UA (S.D.N.Y.)

Euro Brokers, Inc., et al. v. Al Baraka Investment and Development Corp., et al., Case No. 04-CV-07279-UA (S.D.N.Y.)

New York Marine and General Insurance Co. v. Al Qaida, et al., Case No. 04-CV-6105 (S.D.N.Y.)

World Trade Center Properties, LLC, et al. v. Al Baraka Investment and Development Corp., et al., Case No. 04-CV-7280 (S.D.N.Y.)

DECLARATION OF JODI WESTBROOK FLOWERS

Jodi Westbrook Flowers, an attorney admitted pro hac vice to practice before this Court, declares as follows:

1. I am a Member at the firm of Motley Rice, LLC, counsel for Plaintiffs in *Euro Brokers, et al. v. Al Baraka, et al.*, 04 CV 7279 (RCC); *World Trade Center Properties LLC, et al. v. Al Baraka, et al.*, 04 CV 7280 (RCC), and *Burnett v. Al Baraka, et al.*, 03 CV 5738 & 03 CV 9489 (S.D.N.Y.). I submit this Declaration in support of Plaintiffs' Memorandum of Law in Opposition to Motion to Dismiss filed by defendant Yeslam Binladin.

2. Attached as Exhibit A is a true and accurate copy of the Affidavit of Carmen Bin Ladin, signed on February 1, 2006.

3. Attached as Exhibit B is a true and accurate copy of the Affidavit of Jean-Charles Brisard, signed on February 1, 2006.

4. Attached as Exhibit C is a true and accurate copy of business records on

Reflections Properties, Inc. from the Clerk and Comptroller of Palm Beach County, Florida.

5. Attached as Exhibit D are true and accurate copies of Annual Franchise Tax Reports for Knutstorp, Inc. for the years 1993 - 1995 from the Secretary of State for the State of Delaware and Annual Reports for Knutstorp, Inc. for the years 1991, 1994 and 1996 from the Secretary of State for the State of North Carolina.

6. Attached as Exhibit E are true and accurate copies of Annual Franchise Tax Reports for Kinnekulle, Inc. for the years 1995 - 1997 from the Secretary of State for the State of Delaware.

7. Attached as Exhibit F are true and accurate copies of the Certificate of Incorporation for Knutstorp, Inc. dated August 8, 1986, the Certificate of Incorporation for Kinnekulle, Inc. dated August 8, 1986, the Articles of Merger of Knutstorp, Inc. With and Into Kinnekulle, Inc. dated December 31, 1996, and the Articles of Merger of Kinnekulle, Inc. With and Into Falken Limited dated December 15, 1998 from the Secretary of State for the State of Delaware.

8. Attached as Exhibit G is a true and accurate copy of an FBI list dated January 31, 2002 sent by the United States Government to the Secretary General of Italy as available on the Internet at <http://www.antiwar.com/justin/CI-08-02.pdf>.

9. Attached as Exhibit H is a true and accurate copy of an article published in the *Washington Post* entitled "Plane Carried 13 Bin Ladens, Manifest of Sept. 19, 2001, Flight From U.S. is Released" dated July 22, 2004, and a copy of the referenced flight manifest as released and found at http://houseofbush.com/bush_saudi_files/919.php.

10. Attached as Exhibit I is a true and accurate copy of the website of the Saudi Binladin Group in 2001 as preserved by the website www.webarchive.org.

11. Attached as Exhibit J is a true and accurate copy of an interview with Yeslam Bin Laden published in the French Weekly Magazine *VSD* dated September 30, 2005 - December 6, 2005.

12. Attached as Exhibit K is a true and accurate copy of the deed to the property located at 634 Stone Canyon Road, Bel Air, California dated March 8, 1983.

13. Attached as Exhibit L is a true and accurate copy of a Federal Aviation Administration Registry Report for a Lear Jet 31A registered to a Roxbury Technologies US Inc., with a listed issue date of March 6, 2001.

14. Attached as Exhibit M is a true and accurate copy of an article published in the *Associated Press* entitled "Osama bin Laden's half-brother will pay to defend terror mastermind if he's ever captured", written by Nadia Abou El-Magd and dated July 3, 2005; and an article published in the *Pak Tribune* entitled "Osama's brother offers to pay for defence," dated July 2005.

15. Attached as Exhibit N is a true and accurate copy of the Statement of Guillaume Dasquié, signed on January 19, 2006, and an article entitled "U.S. Pressure on Bin Laden's Brother" *Intelligence Newsletter*, December 21, 2000.



Jodi Westbrook Flowers